

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO POPKIN INTERROGATORIES DBP/USPS-13 - 16
(June 28, 2001)

On June 21, 2001, DPB/USPS-13 - 17 were filed. As discussed below, the Postal Service objects, in whole or in part, to items 13 - 16.

Question 13 is quite similar in content to question 50 from Mr. Carlson, to which an objection is also being filed today. The two questions seek information about facilities for which the holiday data reported in LR-2 may have been affected by the operation of a holiday consolidation plan. The Postal Service does not have at headquarters the information necessary to prepare the recut of the data requested by Mr. Popkin, may not have parts of it for some facilities for some years anywhere, and *incorporates by reference the more extensive discussion of materiality and burden filed today in objection to DFC/USPS-50.* Mr. Popkin's question 13 would be more burdensome than Mr. Carlson's question 50, because the former covers all years from 1992 to 2001, while the latter is limited to 2000 and 2001. As noted in the Carlson pleading, further potential refinements in LR-2 are not going to aid resolution of the core issues presented in this proceeding. (The Postal Service will file a response confirming all subparts of the question up to 1.g., but as the purpose of those items seem to be merely to provide a foundation for the actual data request in 1.g., the utility of those

answers is perhaps open to question.)

Questions 14-16 all relate to Mr. Popkin's overwhelming interest in the state of the POM and DMM. The Commission, however, in Order No. 1307 chose not to exercise its discretion to hear that portion of the complaint regarding holiday service vis-a-vis postal manuals. The Postal Service objects to all of these questions on the grounds of relevance. Without waiving that objection, the Postal Service will file a response to DBP/USPS-15, in order to clear up potential ambiguity in its response to DBP/USPS-6.

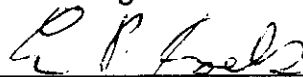
Therefore, the Postal Service objects to DBP/USPS-13 -16 on the grounds stated above, but, without waiving its objections, will provide answers to parts a.-f. of question 13, and to question 15.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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June 28, 2001

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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